



Order Filed on December 30, 2019
by Clerk
U.S. Bankruptcy Court
District of New Jersey

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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY


In re:	Chapter 13
Tony Kostovski,	Case No. 18-21079-RG
	Hearing Date: September 4, 2019 at 10:00AM
Debtor.	Judge: Rosemary Gambardella

**CONSENT ORDER RESOLVING SECURED CREDITOR'S MOTION FOR
ADEQUATE PROTECTION, OR IN THE ALTERNATIVE, RELIEF FROM THE
AUTOMATIC STAY AND REQUIRING DEBTOR PAY ONGOING ESCROWS**

The relief set forth on the following pages, number two (2) through three (3) is hereby

ORDERED

DATED: December 30, 2019


Honorable Rosemary Gambardella
United States Bankruptcy Judge

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Debtor: Tony Kostovski

Case No.: 18-21079-RG

Caption of Order: **CONSENT ORDER RESOLVING SECURED CREDITOR'S
MOTION FOR ADEQUATE PROTECTION, OR IN THE
ALTERNATIVE, RELIEF FROM THE AUTOMATIC STAY
AND REQUIRING DEBTOR PAY ONGOING ESCROWS**

THIS MATTER having been opened to the Court upon the Motion for Adeuqate Protection, or in the Alternative, Relief from Automatic Stay filed by JPMorgan Chase Bank, National Association ("Movant"), with respect to the property commonly known as 28 ALASKA ST, Garfield, New Jersey 07026, and the Court noting the consent of the parties to the form, substance, and entry of the within Order, and for good cause shown ORDERED that:

ORDERED AS FOLLOWS:

1. Debtor shall pay and is responsible for paying all ongoing escrows, including property taxes and hazard insurance premiums as they come due.
2. To the extent Movant has advanced amounts to third parties on Debtor's behalf post-petition, Movant is entitled to file a supplemental proof of claim to recover those amount through plan payments.
3. If Debtor should default by failing to pay property taxes and maintaining property insurance and if Movant is required to advance funds on Debtor's behalf for said payments during the pendency of this case for fourteen (14) days from the due date, Movant's counsel may submit a certification of default and the Court may enter an Order vacating the automatic stay permitting Movant to proceed with its action against the real property commonly known as 28 ALASKA ST, Garfield, New Jersey 07026.
4. Upon dismissal, discharge chapter conversion, or relief from stay, the foregoing terms and conditions shall cease to be binding payments will be due pursuant to the terms of the original loan agreement and Movant may proceed to enforce its remedies under applicable non-bankruptcy law against the Property and/or against the Debtor.

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Debtor: Tony Kostovski

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ALTERNATIVE, RELIEF FROM THE AUTOMATIC STAY**

Consent to Form and Entry

McCalla Raymer Leibert Pierce, LLC
Attorney for the Secured Creditor

Low & Low
Attorney for the Debtor

By: /s/Melissa Licker
Melissa Licker, Esq.

By: /s/Russel L. Low
Russell L. Low

Date: December 24, 2019

Date: December 24, 2019